

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LGN INTERNATIONAL, LLC, and,  
PRUDENT INVESTIMENTOS LTDA,

No. 20-cv-3185-LGS

Plaintiffs,

- against -

HYLAN ASSET MANAGEMENT, LLC,  
ANDREW SHAEVEL,  
BAHAMAS MARKETING GROUP,  
JOEL TUCKER,  
SQ CAPITAL, LLC,  
JT HOLDINGS, INC.,  
HPD LLC,  
HIRSCH MOHINDRA, and  
MAINBROOK ASSET PARTNERS I, LLC,

Defendants.

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**DEFENDANTS HYLAN ASSET MANAGEMENT, LLC, ANDREW SHAEVEL,  
AND MAINBROOK ASSET PARTNERS I, LLC'S NOTICE OF MOTION  
TO DISMISS PURSUANT TO FED. R. CIV. PRO. 12(b)(3) & 12(b)(6)**

Defendants Hylan Asset Management, LLC, Andrew Shaevel, and Mainbrook Asset Partners I, LLC (collectively “Moving Defendants”), by and through their attorneys Lippes Mathias Wexler Friedman LLP, and pursuant to Federal Rules of Civil Procedure 12(b)(3) and 12(b)(6), hereby move this Court for an Order dismissing Plaintiffs’ Amended Complaint (Dkt. 39) in its entirety, with prejudice. This Motion is based upon the accompanying Declaration of Dennis C. Vacco, Esq., Memorandum of Law, Declaration of Andrew Shaevel (Exhibit 1), Plaintiff LGN International, LLC’s registration from the Florida Department of State website (Exhibit 2), and Plea Agreement of Joel Tucker (Exhibit 3).

WHEREFORE, the Moving Defendants, respectfully request that this Court grant their Motion and dismiss Plaintiffs' Complaint with prejudice, together with any other and further relief this Court deems necessary and proper.

Dated: Buffalo, New York  
November 12, 2020

Respectfully submitted,

LIPPES MATHIAS WEXLER FRIEDMAN LLP

/s/Dennis C. Vacco  
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